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June 24, 2013

Via Facsimile and Regular Mail

Newsday
235 Pinelawn Road
Melville, New York 11747

Via Facsimile and Regular Mail

News 12 Long Island
1 Media Crossways
Woodbury, New York 11797

Re: Thomas M. Moroughan v. The County of Suffolk, et al.
Docket No.: CV-12-0512

Dear Sirs:

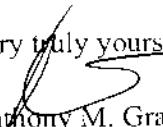
I am counsel to plaintiff Thomas M. Moroughan (Moroughan) and write this letter in connection with an exclusive report published by Newsday on June 23, 2013 regarding the shooting of Moroughan by off-duty Nassau County police officer Anthony DiLeonardo.

The article and the Channel 12 news broadcast both indicate that you are in possession of the complete Nassau County Internal Affairs Bureau Report (IAB Report) which consists of approximately 350 pages.

If you were previously unaware, please be advised that the IAB Report is subject to a Stipulation and Order of Confidentiality limiting its use to parties to the action for litigation purposes only. It is recognized that Newsday is not a party to the Order. Accordingly, I am formally requesting that Newsday voluntarily cease and desist from the further dissemination of the contents contained in the Report, that my office be contacted to arrange the return of the report, and that all other copies in your possession be destroyed. Further, I am requesting that you remove the physical copy of the Report from any electronic media.

Your cooperation in this matter is greatly appreciated and I thank you in advance for your courtesies.

Very truly yours,


Anthony M. Grandinette

AMG/baz

cc: Magistrate Judge A. Kathleen Tomlinson
United States District Court Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

cc: Suffolk County Attorney's Office
County Attorney Brian C. Mitchell, Esq.
H. Lee Dennison Building
100 Veterans Memorial Highway
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Hauppauge, NY 11788-0099

cc: Nassau County Attorney's Office
County Attorney Michael J. Ferguson, Esq.
One West Street
Mineola, NY 11501-4820

cc: Barket, Marion & Epstein
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